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14
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

15 MICHAEL PARDI, Individually and On Behalf
 16 of All Others Similarly Situated,

Case No. 4:21-cv-00076-HSG

17 Plaintiff,

CLASS ACTION

18 vs.

**JOINT STIPULATION AND ORDER TO
 EXTEND CASE DEADLINES BY 30 DAYS**

19 TRICIDA, INC., and GERRIT KLAERNER,

Assigned to: Hon. Haywood S. Gilliam, Jr.

20 Defendant.

1 Lead Plaintiff Jeffrey Fiore (“Lead Plaintiff”) and Defendant Gerrit Klaerner (“Defendant”)
 2 and together with Lead Plaintiff, the “Parties”) by and through their undersigned counsel, hereby
 3 stipulate as follows:

4 **WHEREAS**, on November 13, 2024, the Parties filed a Joint Notice of Pending Settlement
 5 (Dkt. 201) and a Joint Motion for a Stay to Facilitate Settlement (Dkt. 202).

6 **WHEREAS**, on November 13, 2024, the Court granted the Parties’ stay motion, and ordered
 7 that all proceedings in this matter, including all discovery and case deadlines shall be stayed pending
 8 finalization of the settlement documentation and a ruling on Lead Plaintiff’s Motion for Preliminary
 9 Approval of Settlement (Dkt. 204). The Order stated that if the Motion for Preliminary Approval of
 10 Settlement is not filed by December 30, 2024, the Parties shall file a joint status report regarding the
 11 status of settlement. *Id.*

12 **WHEREAS**, on December 30, 2024 the Parties filed a Joint Stipulation to extend the
 13 deadline for Lead Plaintiff to file the Motion for Preliminary Approval of Settlement or for the
 14 Parties to file a joint report regarding the status of settlement by an additional 30 days to January 29,
 15 2025 (Dkt. 205).

16 **WHEREAS**, on December 30, 2024, the Court granted the Parties’ stipulation and ordered
 17 the deadline for Lead Plaintiff to file the Motion for Preliminary Approval of Settlement or for the
 18 Parties to file a joint report regarding the status of settlement be extended by an additional 30 days to
 19 January 29, 2025 (Dkt. 206).

20 **WHEREAS**, Lead Plaintiff sent Defendant a draft Stipulation of Settlement and
 21 accompanying exhibits on December 3, 2024 and the parties have exchanged drafts in the
 22 intervening time.

23 **WHEREAS**, Lead Plaintiff sent Defendant a draft of a confidential opt-out agreement on
 24 January 9, 2025.

25 **WHEREAS**, Defendant is still reviewing the draft documents Lead Plaintiff sent and
 26 evaluating what bankruptcy approvals, if any, are required in light of the bankruptcy of former
 27 defendant Tricida, Inc.

28 **WHEREAS**, the Parties have met and conferred and agree that it would serve the interests of

1 efficiency and conserve resources to extend the current January 29, 2025 deadline for Plaintiffs to
 2 file the Motion for Preliminary Approval of Settlement or for the Parties to file a joint report
 3 regarding the status of settlement by an additional 30 days to February 28, 2025.

4 **NOW THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE,** pursuant
 5 to Civil L.R. 6-2, by and through their undersigned counsel:

- 6 1. The January 29, 2025 deadline either for Lead Plaintiff to file a Motion for Preliminary
 7 Approval of Settlement or for the Parties to file a joint report regarding the status of the
 8 settlement shall be extended by 30 days to February 28, 2025.

9
 10 Date: January 27, 2025

Respectfully submitted,

11
 12 **SIDLEY AUSTIN LLP**

13 By: /s/ Sara B. Brody
 14 Sara B. Brody (SBN 130222)
 Attorneys for Defendant Gerrit Klaerner

15
 16 By: /s/ Jacob A. Walker
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 27 *Attorneys for Lead Plaintiff Jeffrey M. Fiore*
 and the Class

1 **LOCAL RULE 5-1 ATTESTATION**

2 I, Sara B. Brody, am the ECF User whose ID and password are being used to file this
3 Stipulation and [Proposed] Order. In compliance with Local Rule 5-1(i)(3), I hereby attest that the
4 other signatory to this document concurred in the filing of this document.

5 Date: January 27, 2025

6 By: /s/ Sara B. Brody
7 Sara B. Brody

8
9 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

10
11 Dated: 1/27/2025

12 
13 Honorable Haywood S. Gilliam, Jr.
14 United States District Judge